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June 20, 2025

June 23, 2025

Via ECF

Hon. Lewis J. Liman
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

SO ORDERED.

LEWIS J. LIMAN
 United States District Judge

Re: United States v. LabQ Clinical Diagnostics, LLC, et al.,
22 Civ. 751, 22 Civ. 10313 (LJL)

Dear Judge Liman:

Our office is counsel to Defendants LabQ Clinical Diagnostics, LLC (“LabQ”) and Dart Medical Laboratories, Inc. (“Dart Medical”) in the above-captioned action. We write, however, on behalf of all Defendants named in the Government’s Amended Complaint in Intervention (ECF No. 493) (the “Amended Complaint”) to seek a uniform response and briefing schedule to the Amended Complaint.

The Government filed the Amended Complaint on May 19, 2025 pursuant to an agreed upon schedule (*See* ECF No. 491). In accordance with that schedule, the parties agreed that Defendants would file their response to the Amended Complaint on or before June 23, 2025. (*Id.*) As set forth below, however, the Clerk subsequently set a number of different response deadlines for the different Defendants based upon service dates of the Amended Complaint. Further complicating matters, two of the newly added Defendants – NJJ Institutions and Congregation Kolel Vyashkem Avrhom Inc. – have not been formally served and are still in the process of retaining counsel. Our office has now been authorized to accept service of process for these two Defendants as a courtesy to the Government as they finalize their retention of separate counsel. The result has created some confusion, with a different response deadline for the different Defendants (and in some cases conflicting deadlines):

<u>DEFENDANT</u>	<u>CURRENT ANSWER DUE DATE</u>
LabQ Clinical Diagnostics, LLC	06/23/2025 (ECF No. 491) 06/27/2025 (ECF Text Entry dated 05/21/2025)

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Community Mobile Testing, Inc.	06/23/2025 (ECF No. 491) 06/27/2025 (ECF Text Entry dated 05/21/2025)
Dart Medical Laboratory, Inc	06/23/2025 (ECF No. 491) 06/27/2025 (ECF Text Entry dated 05/21/2025)
Moshe Landau	06/23/2025 (ECF No. 491) 06/27/2025 (ECF Text Entry dated 05/21/2025)
175 Park Avenue LLC	06/27/2025 (ECF Text Entry dated 05/21/2025)
Har Hazayism Realty LLC	06/27/2025 (ECF Text Entry dated 05/21/2025) 07/28/2025 (ECF No. 542)
Realty at HH LLC	06/27/2025 (ECF Text Entry dated 05/21/2025)
David Landau	06/27/2025 (ECF Text Entry dated 05/21/2025) 07/28/2025 (ECF No. 543)
Yampola 2022 Charitable Lead Annuity Trust	06/27/2025 (ECF Text Entry dated 05/21/2025) 07/28/2025 (ECF No. 544)
Care Bio Clinical Corp.	06/27/2025 (ECF Text Entry dated 05/21/2025) 06/20/2025 (ECF No. 545)
The Malon Resort NJ LLC	06/27/2025 (ECF Text Entry dated 05/21/2025) 06/20/2025 (ECF No. 546)
Thomas G. Rosano PhD LLC d/b/a National Toxicology Center	06/27/2025 (ECF Text Entry dated 05/21/2025) 06/20/2025 (ECF No. 547)
Carebot ABA LLC	06/27/2025 (ECF Text Entry dated 05/21/2025) 06/24/2025 (ECF No. 549)
MLK Blvd Upscale LLC	06/27/2025 (ECF Text Entry dated 05/21/2025)

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	06/24/2025 (ECF No. 550)
OvaLab LLC	06/27/2025 (ECF Text Entry dated 05/21/2025) 06/24/2025 (ECF No. 551)
NJJ Institutions	06/27/2025 (ECF Text Entry dated 05/21/2025)
Congregation Kolel Vyashkem Avrhom Inc.	06/27/2025 (ECF Text Entry dated 05/21/2025)

Accordingly, with the consent of the Government, Defendants respectfully request that the Court “So-Order” a uniform response schedule for all Defendants as set forth below, with all Defendants’ responses due on July 17, 2025, *i.e.*, 30 days from the acceptance of service for NJJ Institutions and Congregation Kolel Vyashkem Avrhom Inc. This is the first extension request since the Government filed its Amended Complaint.

	Deadline Proposed in 05/08/2025 Letter (ECF No. 491)	Proposed Deadline
Defendants’ Deadline to Respond to the Amended Complaint	06/23/2025	07/17/2025
Government’s Deadline to File an Opposition Brief (if Defendants file a motion to dismiss the Government’s Amended Complaint)	07/28/2025	08/29/2025
Defendants’ Deadline to File a Reply Brief (if Defendants file a motion to dismiss the Government’s Amended Complaint)	08/18/2025	09/19/2025

We thank the Court for its consideration of this request.

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Respectfully submitted,

s/ Lee Vartan

Lee Vartan
Member